

UNITED STATES OF AMERICA
Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Bulk Parcel Return Service)
Expedited Minor Classification Case)

Docket No. MC99-4

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: JENNIFER L. EGGLESTON (OCA/USPS-T2-1-4)
(June 4, 1999)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets,

charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

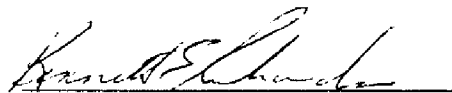
"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and

developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Ted P. Gerarden", is written over a horizontal line.

TED P. GERARDEN
Director
Office of the Consumer Advocate

KENNETH E. RICHARDSON
Attorney

OCA/USPS-T2-1. Please refer to your testimony at page 2, lines 11-12, wherein you refer to the "1998 BPRS Cost Study."

- a. Please confirm that the "1998 BPRS Cost Study" identified in your testimony refers to the "Bulk Parcel Return Service Cost Study," dated October 29, 1998. If you do not confirm, please explain.
- b. Please confirm that you hereby adopt the cost study referenced in part a. of this interrogatory as your testimony in Docket No. MC99-4. If you do not confirm, please explain.

OCA/USPS-T2-2. Please refer to the "Bulk Parcel Return Service Cost Study," dated October 29, 1998 (herein "BPRS Cost Study").

- a. At page 1, Table 1, in the last column, please confirm that there are five mailers (e.g., mailers 2, 3, 5, 6, and 8) who pick up their bulk parcel returns from the Postal Service. If you do not confirm, please explain and identify which of the eight mailers pick up their bulk parcel returns from the Postal Service.
- b. At page 6, in the first sentence of the second paragraph under "D. Delivery Costs," it states that "Four of the eight BPRS recipients do not have their returns delivered to them by the Postal Service." Please reconcile this sentence with Table 1.
- c. In Exhibit E, column [3], please confirm that a "Cost per Delivery per Piece" of \$0.00 identifies mailers who pick up their bulk parcel returns from the Postal Service. If you do not confirm, please explain.

- d. In Exhibit E, column [3], Mailer 2 has a "Cost per Delivery per Piece" of \$0.04. In Table 1, Mailer 2 is identified as a mailer that picks up its bulk parcel returns from the Postal Service. Please reconcile Exhibit 3 and Table 1.

OCA/USPS-T2-3. Please refer to your testimony at page 2, lines 15-17. Please confirm that, for purposes of Bulk Parcel Return Service (herein "BPRS"), the Postal Service is treating BPRS-endorsed parcels that are refused by the recipient as Undeliverable as Addressed (UAA) parcels. If you do not confirm, please explain.

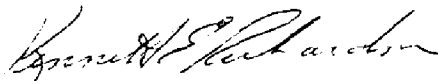
OCA/USPS-T2-4. Please refer to the BPRS Cost Study, Table 1, the last column, which shows that the Postal Service takes returned BPRS parcels to the plants of Mailers 1, 4 and 7.

- a. For Mailers 1, 4, and 7, please explain how the Postal Service determined to take BPRS parcels to the mailers 6 days, 5 days and 2 days per week, respectively.
- b. For Mailer 1, please explain whether the
- i. Postal Service takes mail other than BPRS parcels to Mailer 1 six days per week;
 - ii. Postal Service takes BPRS parcels to Mailer 1 more than once during each of the six days per week.
- c. For Mailer 4, please explain whether the
- i. Postal Service takes mail other than BPRS parcels to Mailer 4 five days per week;

- ii. Postal Service takes BPRS parcels to Mailer 4 more than once during each of the five days per week.
- d. For Mailer 7, please explain whether the
 - i. Postal Service takes mail other than BPRS parcels to Mailer 7 two days per week;
 - ii. Postal Service takes BPRS parcels to Mailer 7 more than once during each of the two days per week.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
June 4, 1999